

DUF₆

Depleted Uranium
Hexafluoride
Conversion Project

DUF6-UDS-PLN-055

Revision 0

November 2006

WASTE CERTIFICATION PROGRAM PLAN

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Uranium Disposition Services, LLC
Burns and Roe Enterprises, Inc.
Duratek, Inc.
Framatome ANP, Inc.

U.S. Department of Energy
Portsmouth Paducah Project Office
Portsmouth Site
Paducah Site

Depleted Uranium Hexafluoride Conversion Project
Waste Certification Program Plan

Lead Preparer

Tammy Stapleton

Waste Disposition Manager



Date: November 2, 2006

Approval

Doug Adkisson

Operations and Maintenance Manager




Date: November 2, 2006

Approval

Don Dalton

QA Manager



Date: November 2, 2006

Approval

Tim Forden

Project Manager



Date: November 2, 2006

DISCLAIMER

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**DUF₆ CONVERSION PROJECT
WASTE CERTIFICATION PROGRAM PLAN, REV. 0**

Revision Summary

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Acronyms

AWCO	Alternate Waste Certification Official
CR	Condition Report
DOE	Department of Energy
DOT	Department of Transportation
DUF6	Depleted Uranium Hexafluoride
ES&H	Environmental, Safety, and Health
LLW	Low-Level Waste
M&TE	Measuring and Test Equipment
NIC	NTS Implementation Crosswalk
NTS	Nevada Test Site
NTSWAC	NTS Waste Acceptance Criteria
QA	Quality Assurance
QAP	Quality Assurance Plan
RCRA	Resource Conservation and Recovery Act
RWAP	Radioactive Waste Acceptance Program
TSCA	Toxic Substance Control Act
UDS	Uranium Disposition Services, LLC
WAC	Waste Acceptance Criteria
WCO	Waste Certification Official
WCP	Waste Certification Program

Definitions

Low-Level Waste – Radioactive waste that is not high-level radioactive waste, spent nuclear fuel, transuranic (TRU) waste, byproduct material (as defined in Section 11e.(2) of the Atomic Energy Act of 1954, as amended), or naturally occurring radioactive material (DOE Order 435.1).

1 PURPOSE

The *Waste Certification Program* (WCP) describes how Uranium Disposition Services, LLC (UDS) waste will be certified for shipment to approved treatment and disposal facilities.

- Satisfies requirements detailed in the Nevada Test Site (NTS) Waste Acceptance Criteria (NTSWAC) and associated quality assurance (QA) requirements
- Applies to all activities associated with NTS Low-level waste (LLW) certification by UDS
- Serves as the *Quality Assurance Plan* (QAP) for the UDS NTS LLW Certification Program
- Implements DOE O 435.1 and DOE M 435.1 requirements to establish a waste certification program

The WCP establishes requirements and responsibilities for the management of waste that will adequately protect workers, the public, and the environment from all activities related to the generation, shipping, and handling of waste by UDS in accordance with Department of Energy (DOE) orders. It is intended to demonstrate that policies, procedures, and practices are in place to control the generation and handling of waste in accordance with applicable regulations and that waste will meet the criteria for acceptance at approved disposal facilities including NTS. The NTS Waste Acceptance Criteria (WAC), EnergySolutions WAC and criteria-specific waste characterization plans and procedures will be used to characterize the waste for Resource Conservation and Recovery Act (RCRA) and Toxic Substances Control Act (TSCA) regulations and ensure that the waste does not contain prohibited items as specified by the designated receiving facility.

2 SCOPE

The WCP for the UDS facilities (both the Paducah and Portsmouth Depleted Uranium Hexafluoride (DUF6) Conversion Facilities and cylinder yards) provides requirements to meet waste stream characterization for waste form, packaging, certification, and transfer, as established in DOE O 435.1 and DOE M 435.1. In addition, the WCP meets requirements specified in the NTSWAC; refer to the UDS-U-NIC-1001 for the flowdown of NTSWAC requirements.

This document applies to all UDS staff and their subcontractors, visitors, and guests that generate or manage waste.

3 RESPONSIBILITIES

The organization chart related to the Waste Certification Program is shown in Attachment 1.

3.1 WASTE CERTIFICATION OFFICIAL

The waste certification official (WCO) reports directly to the operations and maintenance manager, and is independent from other project organizations. The WCO position is

independent from operations, cost, and schedule responsibilities when performing waste certification activities.

The WCO has the primary responsibility for certifying that UDS waste described in this program meets the requirements of the WAC for the designated receiving facility. WCO responsibilities under the certification program include:

- Maintaining and updating the WCP
- Certifying that waste is properly segregated and packaged and that it meets the requirements of the WAC for the designated receiving facility and the UDS waste certification program
- Ensuring that all personnel are properly trained commensurate to their positions to perform waste functions in accordance with UDS requirements
- Reviewing the NTS Implementation Crosswalk (NIC) annually to ensure adequacy and submitting the NIC, once completed, to the radioactive waste acceptance program (RWAP) manager
- Ensuring that appropriate requirements as specified in 40 CFR 261-268 for RCRA hazardous waste and 40 CFR 761 for TSCA waste are met
- Verifying that appropriate waste packages are procured
- Delegating or assigning duties (e.g., conducting assessments and inspections or performing on-site activities) to appropriate UDS personnel (e.g., QA or alternate WCOs) with respect to the WCP
- Ensuring that annual assessments of the WCP are performed
- Submitting a current version of the approved WCP and NIC to NTS once facility approval is received; the WCP will be submitted to NTS upon revision
- Scheduling and conducting periodic surveillances of activities critical to the waste certification program
- Developing sampling and analysis plans for UDS waste, as needed
- Compiling waste stream-specific characterization plans, as needed
- Developing waste profiles
- Preparing or reviewing all waste package shipping documentation
- Arranging for transportation services for off-site shipments
- Making final arrangements for physical waste shipment to the designated receiving facility

- Maintaining waste characterization packages
- Ensuring that waste is traceable from the point-of-generation to disposition
- Ensuring that vendors are assessed to established procurement specifications developed by technically qualified personnel and are technically competent to perform work in support of the WCP
- Identifying the appropriate level of training and qualification necessary to support the WCP

3.2 ALTERNATE WASTE CERTIFICATION OFFICIALS AND PACKAGE CERTIFIERS

The alternate waste certification officials (AWCO) and package certifiers report to the WCO when performing NTS waste certification activities.

- AWCOs act on behalf of the WCO as designated

3.3 PROCUREMENT

UDS procurement personnel are responsible for the procurement of items (e.g., container and absorbent purchasing) and services critical to the WCP. Procurement personnel are also responsible for developing procedures, in cooperation with the WCO and QA that implement the appropriate level of rigor in the procurement process to ensure quality in the procurement of goods and services.

3.4 TRANSPORTATION

UDS transportation specialist or support personnel, or their designees, perform the following functions:

- Review all packaging documentation for waste shipments
- Affix or review Department of Transportation (DOT)-required marking and labelling
- Ensure that packaging meets appropriate specifications
- Perform DOT classification of materials and prepare and issue manifests, bills of lading, or other required transportation documents
- Ensure compliance with Federal Motor Carrier Safety regulations.

3.5 TRAINING

The UDS training supervisor is responsible for developing the training programs deemed necessary by the WCO to support WCP activities with the assistance of applicable subject matter experts. UDS managers, in cooperation with the WCO and the UDS training supervisor, are responsible for implementing the training deemed necessary for personnel supporting the WCP as defined in UDS-U-TRN-0001.

3.6 ENVIRONMENTAL COMPLIANCE

Waste management personnel are responsible for ensuring that appropriate requirements as specified in 40 CFR 261-268 for RCRA hazardous waste, 40 CFR 761 for TSCA waste, and 10CFR835, Appendix D (NTS) are met.

3.7 RADIOLOGICAL CONTROL

Environmental, safety, and health (ES&H) are responsible for providing radiological control services needed to support the WCP. ES&H support the WCP specifically by providing personnel to accomplish the following:

- Perform container and final shipment surveys (measurements of fixed and removable radioactive contamination and measurements of direct radiation) to DOT requirements
- Advise staff regarding personnel protective clothing and equipment requirements
- Perform instrument calibration
- Provide health physics information to transportation organizations for shipping determinations

3.8 WASTE GENERATORS

Waste generators are defined as any activity that generates waste material. This plan applies to LLW, mixed LLW, and hazardous waste (non-radiologically contaminated). Waste generators are responsible for:

- Properly identifying and characterizing their waste to the extent possible in accordance with the WCP
- Handling and packaging waste in accordance with applicable UDS procedures
- Documenting waste generation, packaging, processing and characterization
- Implementing actions necessary to correct any non-conformance that is identified

4 REQUIREMENTS

- DOE Order 435.1: Radioactive Waste Management
- Nevada Test Site Waste Acceptance Criteria
- 40 CFR 261-268 for RCRA Hazardous Waste
- 40 CFR 761 for TSCA Waste
- EnergySolutions of Utah Waste Acceptance and License

5 QUALITY ASSURANCE

5.1 PROGRAM

This document functions as the QAP for the UDS WCP. It is a flowdown document from the corporate QAP, DUF6-UDS-PLN-003, and specifies how elements specific to waste certification are managed and implemented. Implementation of the program and the procedures specified herein is the responsibility of the WCO, the UDS QA organization, the UDS procurement organization, process operations personnel and subcontractors, UDS line managers, and other participating organizations.

The QA organization assists the WCO (as requested) with independent oversight of activities related to certification. QA works closely with UDS management and the WCO to help resolve issues that affect the quality of WCP activities. Specific QA responsibilities include:

- Assisting with scheduled certification program assessments
- Conducting or arranging independent assessments, as necessary
- Verifying that corrective actions are performed in relation to audit findings and non-conformances

The WCO is responsible for oversight of the WCP and QA activities to ensure that waste traceability, waste packages, characterization data, and waste shipments comply with the UDS procedures and the waste acceptance of the receiving facility. Other personnel with responsibility for QA activities in the WCP are the operations personnel, waste generators, UDS line managers (and their staff), and supporting technical organizations. The WCO has overall responsibility for QA with respect to the NTS LLW Certification Program. The AWCOS report to the WCO when performing NTS waste certification activities.

5.2 PERSONNEL QUALIFICATION AND TRAINING

5.2.1 PERSONNEL QUALIFICATION

Job positions and minimum qualifications in terms of education, experience, knowledge, and skills necessary to carry out associated work activities are maintained. Personnel qualification records may include information such as resumes, academic credentials, registrations/certifications, licenses, and training attendance records and certificates. Qualifications for each position are maintained as training records and are retained by the UDS Training Supervisor.

5.2.2 TRAINING

Training should provide the knowledge and skills required to perform specific tasks or to improve job performance as defined in UDS-U-TRN-0001, *Training and Qualification*. Training shall be provided to achieve initial proficiency, maintain proficiency, and help personnel adapt to changes in technology, methods, or job function. To maximize personnel performance, both general and project-specific training will be provided. Training may take the form of

orientation/indoctrination, formal and informal training classes, computer-based training, or on-the-job training. Training must be documented and records maintained for each employee.

UDS managers are responsible for determining the need for training based on the scope, complexity, and nature of the activity to be performed, as well as the education, experience, and proficiency of the personnel involved. The WCO, in cooperation with UDS line management and the UDS training supervisor, shall identify the training specifically required to implement the WCP.

Managers must ensure that personnel are provided with the fundamentals for their assigned work and that an understanding of the associated quality requirements is achieved. Personnel involved in the characterization, processing, and transportation of waste and related activities (e.g., procurement and QA) will have training commensurate with the importance of the task.

Job proficiency will be enhanced through continued training. Continuing or refresher training appropriate for each position will be conducted to support continued competence and to achieve progressive improvement and adaptation to changes in requirements and technology.

5.3 *QUALITY IMPROVEMENT*

UDS has a comprehensive system for addressing corrective actions that stem from programmatic deficiencies or non-conformances. UDS-U-QAP-0005 describes this corrective action program (including reporting and tracking through completion) for conditions determined to be adverse to safety, health, operations, quality, security, or the environment.

Non-conformance control in the WCP applies to shipping packages, containers, handling devices, packages of waste, and supporting programs that do not meet all of the NTSWAC requirements or do not meet waste certification requirements. Non-conformances that affect the certification of the waste package require the issuance of a condition report (CR) as defined in UDS-U-QAP-0005, *Condition Reporting*. UDS-U-QAP-0005 specifies who can initiate a CR and who has the responsibility for evaluating and dispositioning the CR.

A CR is generated in instances when waste packages have been packaged improperly, when waste contains prohibited materials, or when waste or other items (e.g., waste packages) do not conform to the WAC of the designated receiving facility. A CR is also generated when serious damage or defect is detected in the waste package, such as punctured waste packages or any other defect rendering the container unable to meet the waste container requirements. The disposition of nonconforming items will be reviewed for technical justification and disposition by authorized personnel.

Additional non-conformances could be detected during inspection activities. CRs will be issued if the non-conformance affects the certification status of the packaged waste and for the hardware used in the waste characterization and certification process.

All nonconforming items will be marked with status indicators (hold tags or electronic holds).

5.4 DOCUMENT AND RECORD CONTROL

The review, acceptance, distribution, and updating of documents and the identification, collection, indexing, filing, and maintenance of records pertaining to waste certification is subject to a formal control system. This control system is described in DUF6-UDS-PLN-015, *Document Management Plan*.

Documents referenced in this program are considered supporting documentation, and changes will be submitted to RWAP upon request. Changes to this program will require a new copy of the document(s) or replacement pages be sent to RWAP.

5.5 WORK PROCESSES

Activities affecting the quality of the WCP shall be prescribed by and performed in accordance with procedures controlled by UDS-U-QAP-0003, *Procedure System*. These documents shall include or reference appropriate quantitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished.

Work conducted by UDS personnel is controlled and conducted in accordance with documented work instructions or procedures for the given activity. The WCO, or AWCO, reviews procedures and work instructions of support organizations that affect certification, as a part of routine program surveillances. The WCO shall document the review and concurrence of procedures (including revisions) critical to waste certification activities (i.e., generation, packaging, inspection, characterization, certification, etc.).

5.5.1 STANDARD PROCEDURES

Processes important to the WCP have controls and/or verification steps identified as part of the operating procedures. Such processes include sample collection and analysis for hazardous waste determination, waste packaging, storage, and shipment for disposal.

5.5.2 WASTE CHARACTERIZATION

Waste characterization plans for waste are developed in accordance with DOE Order 435.1 and requirements set forth by the designated receiving facility including the NTSWAC. Characterization requirements for waste are described in UDS-U-WMP-1001, *Waste Characterization*, the applicable waste profile, and, if applicable, any on-site requirements. The sampling methods for UDS generated waste are described in the appropriate sampling and analysis plan or waste stream-specific sampling procedures. A waste characterization file will be developed and maintained for each approved waste profile. This document will give the detailed methods for characterization and other applicable waste stream information.

5.5.3 WASTE PACKAGING AND TRANSFER

Waste packaging and transfer is controlled by DOT regulations and procedures such as UDS-U-WMP-2001, *Waste Shipments*. Waste stream-specific or facility procedures describe specific waste packaging, handling, and storage methods.

5.5.4 CONTROL OF THE WASTE CERTIFICATION PROCESS

The entire waste certification process is a controlled process. Procedures control the following processes: procurement, inspection, characterization, filling, packaging, closing, labeling, tracking, storing, loading, and shipping waste. Waste certification controls and verification steps are included in operating procedures with applicable hold points for the WCO.

5.5.5 CONTROL OF MEASURING AND TEST EQUIPMENT

Measuring and test equipment (M&TE) and measuring devices bear, by label, evidence that they are currently calibrated or certified for use. The marking includes a unique identification, date of calibration, calibration due date, and any limitations. Out-of-calibration devices are tagged and/or segregated and not used. On-site and off-site calibration of instruments, where required, is done in an environment with controlled temperature, humidity, and airborne particulate concentration. Standards are traceable to the National Institute for Standards and Technology or other acceptable, known standards.

M&TE is controlled to ensure that such items are of the proper type, range, accuracy, and tolerance to accomplish the function of determining conformance to specified requirements. The methods and interval of calibration for each item are defined, based on the type of equipment, stability characteristics, required accuracy, intended use, and other conditions affecting measurement control. M&TE is controlled in accordance with procedures such as UDS-U-GFP-0009, *Calibration and Control of Torque Wrenches*.

When M&TE is found to be out of calibration or beyond its due date for recalibration, a remedial action evaluation will be made and documented regarding the validity of previous inspection or test results and of the acceptability of items previously inspected or tested. This evaluation will be documented by a non-conformance report as described in UDS-U-QAP-0005, *Condition Reporting*.

5.6 DESIGN

The design inputs for items or facilities critical to the waste certification program are controlled by UDS procedures. The design of these items/facilities is documented by specification and/or drawings as defined in and controlled by the applicable UDS procedures. Design adequacy shall be verified by any competent person(s) other than those who designed the item.

5.6.1 TEST CONTROLS REQUIREMENTS

Test controls are performed routinely to substantiate waste certification and to verify conformance to specifications and requirements of NTSWAC. Examples of test controls include instrument calibration, background measurements, calibration checks for scales, and calibration source traceability.

5.6.2 COMPUTER SYSTEMS AND SOFTWARE

Computer systems shall undergo data testing to verify the ability to obtain valid results. Data testing shall be initiated upon installation and after significant modification of a computer system. Although commercially available software packages are excluded from validation and

verification requirements, databases or spreadsheets developed from these software products that perform calculation and present data used for waste certification shall be peer-reviewed for independent verification of the results.

5.6.3 CONTROLS FOR CONTAINER INTEGRITY

Containers are inspected upon receipt from the supplier and again prior to filling. The filled waste container is inspected by the WCO or AWCO prior to shipment certification. If, at any point, the waste container or waste contents fail to pass inspection, a CR is issued and the item is marked in accordance with UDS-U-QAP-0005, *Condition Reporting*.

5.7 ***PROCUREMENT CONTROL***

Procurement of items and services important to the WCP is controlled to ensure conformance with specified requirements. The selection of suppliers is based on evaluations of their capabilities to provide items or services in accordance with the requirements of the procurement documents. These evaluations shall provide evidence of quality furnished by the supplier. Based on the complexity of the item or service, this evaluation is further accomplished through receipt inspections, source inspections, assessments, or surveillances, as appropriate. At a minimum, supplier assessments or surveys shall be completed as required by UDS-U-QAP-0014, *Supplier Quality Program Evaluation* to ensure conformance to specified requirements is maintained.

Technical requirements shall be specified in procurement documents. These documents shall specify and/or reference (as applicable) drawings, specifications, codes, standards, regulations, procedures, or instructions that describe the items or services to be furnished. The documents shall also specify any tests, inspections, and acceptance requirements of the purchaser. The procurement documents shall require that the supplier have a documented quality assurance program consistent with the applicable item or service to be procured.

Procurement documents shall identify the documentation required to be submitted for information, review, and approval.

Procurement documents shall be reviewed to ensure they contain appropriate technical and quality requirements. These reviews shall be conducted on the procurement documents or on documents traceable to the procurement documents. Procurement document changes shall require the same degree of review and approval as the original.

The following procurement items have been identified as being critical to the Waste Certification Program:

- Absorbent material
- Process chemicals
- Process materials
- Waste containers
- Laboratory services

Suppliers of components (e.g., off-the-shelf sorbents) that are tested or verified for conformance to technical requirements may not need to be assessed, provided the testing demonstrates the

procured component conforms to design requirements. Confirmation testing will be documented.

5.8 INSPECTION AND ACCEPTANCE TESTING

5.8.1 SCHEDULED AND UNSCHEDULED INSPECTIONS

Scheduled and unscheduled inspections are performed for activities important to the WCP.

Inspections shall be conducted by qualified personnel having no responsibility for performing or supervising the work being inspected. Records of inspection shall identify the item inspected, date of inspection, inspector, type of inspection, inspection results, and reference to information on action taken in connection with the non-conformance.

5.8.2 IN-PROCESS INSPECTIONS

During waste packaging activities, in-process inspections will be conducted and documented through UDS-U-GFP-0008, *Surveillances*, as an unscheduled surveillance.

5.8.3 RECEIPT INSPECTION

Items critical to the WCP will be subject to receipt inspection as they enter the site to verify conformance to procurement documents and design criteria as defined in UDS-PRP-022, *Material Receipt Control*. Completed inspection checklists will be maintained as a record in accordance with DUF6-UDS-PLN-015, *Document Management Plan*.

5.8.4 SHIPMENT INSPECTION

UDS personnel or subcontractors associated with transportation activities will inspect the shipment and supporting documentation prior to transport. This review will be documented on an off-site waste shipment checklist per UDS-U-WMP-2001, *Waste Shipments* and UDS-U-WMP-1007, *Waste Certification*. The individuals from the listed organization will complete the checklist to ensure compliance with the WAC of the designated facility, DOE, DOT, and other applicable state and federal requirements. Each completed checklist will be maintained as a quality record in accordance with document management procedures.

The WCO or AWCO inspects the documentation and waste package for each shipment of waste. If the shipment meets the requirements of the NTSWAC, the WCO or AWCO completes and signs the NTS Shipment Preparation Checklist in accordance with UDS-U-WMP-1007, *Waste Certification*, indicating that the shipping package has been reviewed for accuracy and completeness. The Package Certification Label is included in this shipping documentation package for transfer of the waste package.

The WCO or AWCO completes a Waste Certification Statement attesting that the shipment is certified to meet the NTSWAC requirements.

5.9 *MANAGEMENT ASSESSMENT*

In accordance with UDS-QAP-013, *Management Assessments*, managers will periodically assess the performance of their organizations and functions to determine how well they meet requirements, expectations, and mission objectives so that improvements can be made to their processes.

Management assessments should cover operations, activities, and performance processes such as: planning; qualification; training; staffing; organizational interfaces; communications; process controls; and mission/project objectives to assure that they are effectively and efficiently being met.

Assessment results must be documented in written reports and forwarded to the appropriate organizations.

The QA manager will forward the reports from assessments associated with the WCP to the WCO.

5.10 *INDEPENDENT ASSESSMENT*

Independent assessments shall be planned and conducted to advise and inform managers of the implementation and adequacy of programs, operations, and activities in accordance with UDS-QAP-012, *Independent Assessments*. The group performing independent assessments shall have sufficient authority and freedom to carry out its responsibilities. Annual assessments of the waste certification program shall be performed to verify compliance with applicable program requirements and promote improvement. An assessment schedule must be developed by the WCO to review various elements throughout a calendar year. When surveillances are used as the annual assessment, a formal report shall be prepared and approved by a qualified lead assessor identifying the activities, conclusions, findings and corrective actions initiated during the surveillance.

The QA manager will forward the reports from assessments associated with the WCP to the WCO.

5.11 *SURVEILLANCES*

The inspection process will consist of monitoring or observing an item, activity, system, or process to verify that it conforms to specified requirements. Surveillances are less formal than an assessment and are intended to facilitate the frequent monitoring of work in progress to determine and document compliance with established requirements and procedures. The WCO or designee and QA perform surveillances of certification activities on a regularly scheduled basis. Surveillances are conducted and documented in accordance with UDS-U-GFP-0008, *Surveillances*.

The WCO, or designee, and QA personnel establish, schedule, and manage the surveillance and assessment aspects of the certification program. Surveillances are performed in accordance with established schedules, procedures, and checklists. It is the WCO's responsibility to ensure that surveillances are performed. Surveillances frequencies will be determined based on results and findings of verification activities but will be conducted on an

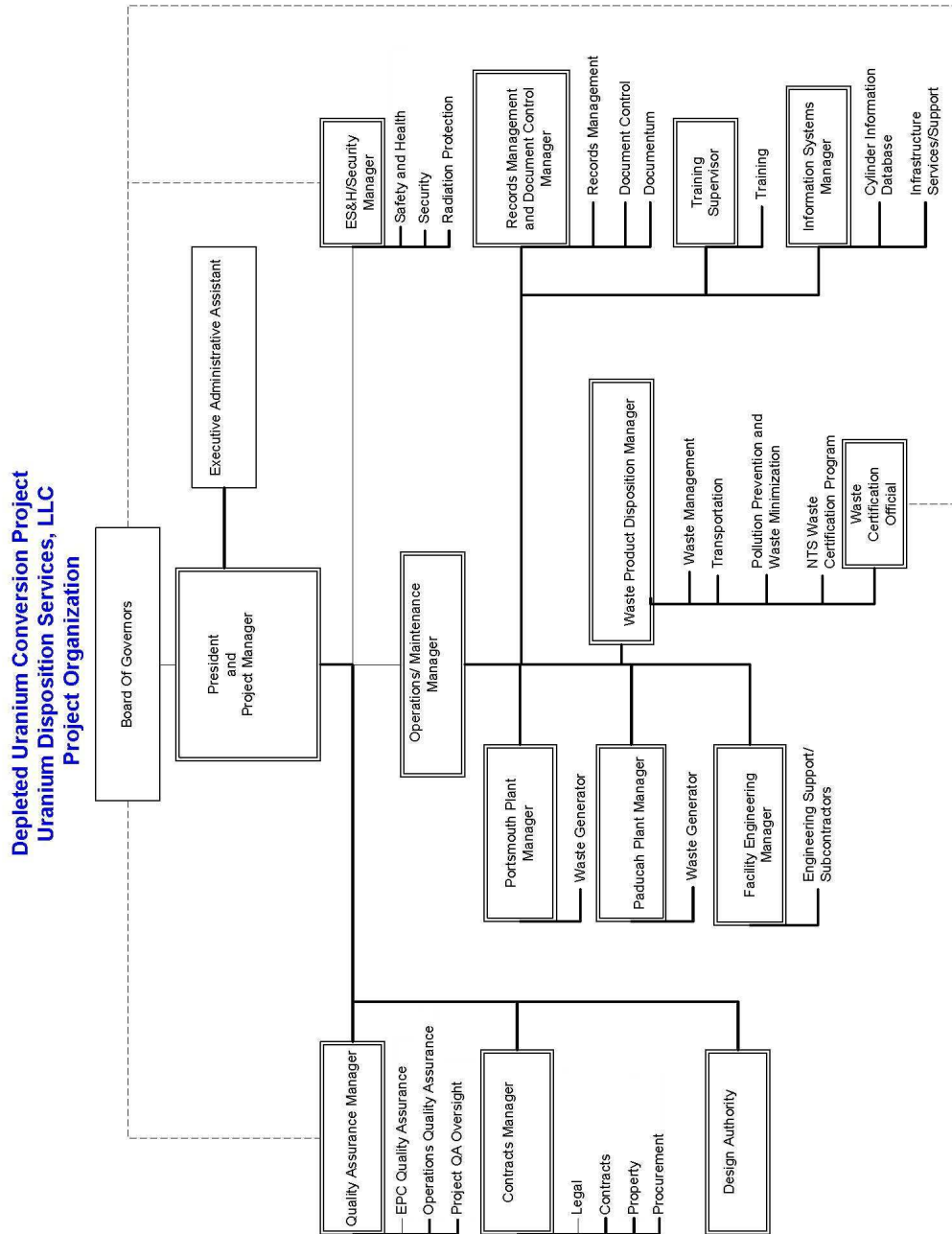
annual basis to ensure compliance with the requirements of the NTSWAC and the waste certification program. Once programmatic approval is obtained, the WCO will ensure an independent, internal assessment is conducted annually to verify NTSWAC compliance.

The assessment team submits findings to the WCO, who then submits copies to the appropriate managers and responsible personnel. Responses to assessment team reports are made to the WCO. The WCO determines whether findings indicate failure to ensure that certifiable wastes are being generated, and shall, if necessary, take appropriate action, which may include stopping operations. Assessments are conducted as specified in this program and UDS-QAP-012, *Independent Assessments*. Corrective actions resulting from Waste Certification Program assessments are documented, approved, and tracked through closure in accordance with UDS-U-QAP-0005, *Condition Reporting*.

6 REFERENCES

- 6.1.1 UDS-U-TRN-0001, *Training and Qualification*
- 6.1.2 UDS-U-QAP-0005, *Condition Reporting*
- 6.1.3 DUF6-UDS-PLN-015, *Document Management Plan*
- 6.1.4 UDS-U-WMP-1001, *Waste Characterization*
- 6.1.5 UDS-U-WMP-2001, *Waste Shipments*
- 6.1.6 UDS-U-GFP-0009, *Calibration and Control of Torque Wrenches*
- 6.1.7 UDS-U-QAP-0014, *Supplier Quality Program Evaluation*
- 6.1.8 UDS-U-WMP-1007, *NTS Waste Certification*
- 6.1.9 UDS-QAP-013, *Management Assessments*
- 6.1.10 UDS-QAP-012, *Independent Assessments*
- 6.1.11 UDS-U-GFP-0008, *Surveillances*

Attachment A
Organizational Chart



END OF DOCUMENT